



STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

2222 Cleanwater Lane, LU-11 • Olympia, Washington 98504-6811 • (206) 753-2351

May 30, 1985

Mr. Vincent McQuiggin, Project Coordinator  
Pacific Wood Treating Corporation (PWT)  
111 West Division Street  
P. O. Box 518  
Ridgefield, Washington 98642



Dear Mr. McQuiggin:

Dangerous Waste (DW) Regulations (Chapter 173-303 WAC)  
Inspection Conducted on April 25, 1985 Pacific Wood Treating  
Corporation, Ridgefield Brick and Tile Site (RBT),  
EPA/State ID #WAD 009036906

Thank you for the cooperation provided to me during my recent inspection of the Pacific Wood Treating Corporation's (PWT) Ridgefield Brick and Tile (RBT) land disposal site located at 3510 N.W. 289th Street, Ridgefield, Washington. Those present during the April 25, 1985 inspection were yourself of PWT, Debbie Uskoski of PWT, Randy Sweet of Sweet, Edwards and Associates, Inc. (present during part of the inspection), and myself of the Washington State Department of Ecology (WDOE). The Dangerous Waste (DW) Regulations compliance inspection consisted of completion of the compliance checklist/questionnaire (enclosed) and a field inspection of the PWT/RBT facility. I also conducted an evaluation of the PWT/RBT file documents of the WDOE. The results of this evaluation are as follows.

The PWT/RBT facility consists of an inoperative 175.8 by 169.4 feet lined, capped, and monitored DW landfill which was closed under the close supervision of the WDOE and the U.S. Environmental Protection Agency (EPA) via such mechanisms as WDOE Order No. DE 83-468 (dated October 26, 1983) and Notice of Penalty No. DE 83-284 (dated June 20, 1983). EPA's comments on the PWT/RBT Draft Closure and Post-Closure Plan for the Ridgefield Brick and Tile Site (as dated July 15, 1983) were provided in an August 10, 1983 letter to Eric Egbers of the WDOE from Kenneth D. Feigner, Chief, Waste Management Branch, U.S. EPA. This letter stated, in part, that the "plan is generally comprehensive and well done" and that "EPA is willing to accept, however, an environmentally sound closure alternative" (i.e. an alternative to an interim status facility closure) "that includes measures equivalent to the interim status closure and post - closure requirements...." The results of my compliance inspection lead me to conclude that the facility appears to have been conscientiously closed per the aforementioned closure agreements and that post-closure commitments are being met with the following exceptions:

40 CFR 265.145 - Financial Assurance for post-closure monitoring and maintenance

Although PWT applied in 1983 for post closure insurance with the Fred S. James Insurance Company of Portland, Oregon, it has not been successfully obtained. Per 40 CFR 265.145, please obtain post closure insurance by September 1, 1985 and submit evidence of its procurement to me immediately thereafter. I have enclosed a copy of Wording of Financial Instruments Required by WAC 173-303-400 and 173-303-620 for Dangerous Waste Facilities, WDOE Hazardous Waste Section, July 1, 1984 for your utilization. In addition, please complete the enclosed Certification of Compliance by September 1, 1985 and return it to me.

Facility Maintenance

It is my understanding that the alleged cattle break-in onto the actual disposal site consisted of one instance which occurred at least a year ago during which time a cow(s) broke through an out lying fence. This problem was promptly solved via the installation of a new barbed wire fence immediately adjacent to the perimeter of the buried wastes.

My infield inspection revealed that run-on, run-off, and direct precipitation onto the site is controlled and diverted via the landfill cap, a thick grass cover, and the three perimeter rock lined ditches. A surface crack which developed immediately outside the eastern site boundary during December 1983 was filled with bentonite and re-vegetated. It was no longer in evidence, and analyses of toe drain samples collected during and immediately after the crack's development indicated naphthalene, pentachlorophenol, and arsenic levels well below the values stipulated in WDOE Order DE 83-468.

Groundwater, Lysimeter, and Toe Drain (Leachate) Sampling

The 1984 annual summary and statistical analysis of water quality data (as dated January 9, 1985) collected at the PWT/RBT site revealed that:

1. WDOE DE 83-468 stipulated concentrations of arsenic (one half drinking water standards), pentachlorophenol and naphthalene (one-half the acute freshwater aquatic life toxicity criteria) are consistently being met.
2. The major parameters of concern per the WDOE DE 83-468 are often at less than detectable levels.
3. Per 40 CFR 265.93 statistical methods, there was no significant increase of downgradient water quality parameters over background values.

The waste in the PWT/RBT site consists of woodwaste (approximately 95%) and ash from the incineration of the sludge resulting from the treatment of the wastewater of a wood treating industry which utilizes pentachlorophenol and

creosote (K001). Only one fraction of the bag house ash was a DW due to its EP toxicity for arsenic (D004). All of the aforementioned factors lead me to conclude that the PWT/RBT site appears to constitute a properly closed and managed land disposal facility of minimal potential environmental hazard.

#### Additional Documentation

Although not a requirement, I have the following suggestions for clarifying facility management and closure status in the future.

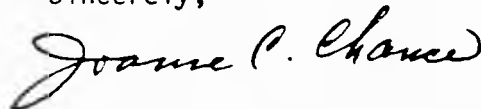
1. Annually collect and analyze a sample from the underdrain sump instead of one of the two toe drain samples (distribution box or sump).
2. Attempt to develop a record of toe drain and underdrain flow quantities ( $\pm 20\%$ ).
3. Include a site map with the ground water monitoring report which indicates the well and lysimeter sampling locations as identified in the laboratory reports (i.e. Muffet, Rutkowski, etc.) and distances to said sample collection points. (All other maps identify wells by number rather than owner). In addition, correct the error on Page 16 of the draft closure/post closure plan which states that the back-ground lysimeter is located to the northeast (should state southeast.)
4. Incorporate a figure illustrating the existence of the perforated underdrain pipes in the Certification of Closure document (Wicks, February 15, 1984).
5. Where available, incorporate the following into the Certification of Closure document's drawings (i.e. figure entitled Final Closure Layout, revised 5/9/84).
  - a. finished surface contours (over refuse itself)
  - b. bottom liner slope
  - c. slopes and elevations of underdrain, toe, and two tight lines to sumps
  - d. procedures used to insure 95% relative compaction of cover material at specified thickness (1.5 feet)
  - e. drawing indicating relocation of toe drain into refuse mass per reviewer's comments
  - f. site fencing improvements

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6. Does Figure 10 (revised 8/19/83) of the Addendum to Draft Closure and Post Closure Plan accurately reflect the lysimeter locations? A map indicating the number assigned to each lysimeter is needed in reference to sampling results provided in the monitoring report.
7. The figure entitled Final Closure Layout (revised 5/9/84) indicates that surface runoff, (i.e. from rock lined open channel) flows to sumps. Based on my knowledge, this is not true. Please address.
8. The post closure plan should address inspection of lines for solid's deposition and procedures for cleanout of lines (perforated and non-perforated) where feasible. Please submit a copy of your entire post closure inspection checklist to me by September 1, 1985 and indicate such compliance on the enclosed Certificate of Compliance.

I look forward to your timely submittal of the aforementioned documentation of post closure insurance and inspection. Please contact me at (206) 753-8532 if you have any questions or concerns.

Sincerely,



Joanne C. Chance  
Hazardous/Solid Waste Engineer

JC:pw(1/4)

Enclosures

Wording of Financial Instruments  
Compliance Checklist  
Certification of Compliance  
Copies of prior orders (2)

cc: Tom Cook, WDOE/with checklist  
Janice Kelley, WDOE/with certification  
Bob Stamnes, EPA/with checklist

Please complete and return this form to Joanne C. Chance, Washington Department of Ecology, Southwest Regional Office, 7272 Cleanwater Lane, Mail Stop LU-11, Olympia, Washington 98504, by September 1, 1985.

CERTIFICATE OF COMPLIANCE

As a legal representative of Pacific Wood Treating, I certify that to the best of my knowledge, the compliance status at our hazardous waste facility located at 3510 Northwest 289th Street, Ridgefield, Washington, Facility I.D. No. WAD009036906 is as shown below.

<u>Items of Noncompliance</u>	<u>Category I, II, III</u>	<u>Compliance Date</u>	<u>Compliance Status (Check One)</u>		<u>Comments</u>
			<u>Complied</u>	<u>Not Complied</u>	
40 CFR 265.145	III	9/1/85			
Post-Closure Inspection Checklist	III	9/1/85			

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Printed Name)

\_\_\_\_\_  
(Title)

\_\_\_\_\_  
(Date)